

UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: :
DANIEL P. ERRIGO, JR. and :
CYNTHIA M. PAISLEY-ERRIGO : CHAPTER 13
Debtors. :

DITECH FINANCIAL, LLC :
Movant, :

vs. :
DANIEL P. ERRIGO, JR. and :
CYNTHIA M. PAISLEY-ERRIGO : CASE NO. 5-19-00116
Respondents. :

DEBTORS' ANSWER TO MOTION FOR RELIEF FROM
AUTOMATIC STAY UNDER SECTION 362

AND NOW COMES, Daniel and Cynthia Errigo, the Debtors, and files an Answer to Ditech
Financial's Motion for Relief From the Automatic Stay:

1. Daniel and Cynthia Errigo (hereinafter the "Debtors") filed a Chapter 13 bankruptcy
proceeding with the U.S. Bankruptcy Court for the Middle District of Pennsylvania.

2. Movant alleges that Debtor has failed to make monthly payments.

3. Debtors' Counsel is in the process of contacting the Debtors to ascertain if said
payments

have been made and/or if the Debtors are in possession of the funds needed to cure the arrears.

4. Movant is not entitled to relief from the automatic stay as the arrearage amount due
has been paid or shall be paid through the Chapter 13 Plan, and/or a six (6) month Stipulation, and,
therefore, the Movant is adequately protected.

WHEREFORE, the Debtors respectfully request that Movant's Motion for Relief from the Automatic Stay be denied.

Respectfully submitted,

Date: June 28, 2019

/s/Tullio DeLuca
Tullio DeLuca, Esquire
PA ID# 59887
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on June 28, 2019, he caused a true and correct copy of Debtor's Answer to Ditech Financial, LLC's Motion for Relief from the Automatic Stay to be served Via First Class United States Mail, Postage Pre-paid in the above-referenced case, on the following:

Charles J. DeHart, III, Esq. at dehartstaff@ramapo.com

James C. Warmbrodt, Esq. at Jwarmbrodt@kmlawgroup.com

Dated: June 28, 2019

/s/Tullio DeLuca
Tullio DeLuca, Esquire